

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-63 THROUGH 65]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

September 2, 2011

Respectfully submitted,

N20111K63

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-63 Please refer to your response to Interrogatory PR/USPS-12 subpart [f].

[a] Please advise when the Postal Service plans to file the first update to The List.

[b] At what intervals does the Postal Service plan to file subsequent updates?

[c] Please confirm, or explain if you are unable to confirm, that the updates to The List will consist of corrections and/or deletions and will not consist of additions.

DBP/USPS-64 Please refer to Library Reference N-2011-1/9

[a] Please provide a new listing showing the two-letter state abbreviation added as an additional column. This is needed to make the Public version useful since the Finance Numbers have been redacted.

[b] What is the significance of the single digit that follows the Unit Name in many of the entries?

[c] On what basis are the individual offices sorted in the printout?

DBP/USPS-65 Please refer to Library Reference N-2011-1/8

[a] On what basis are the individual offices sorted in the printout?

[b] Please confirm or explain that the Public Version of this reference has redacted only the Facility Finance Number and the PO Boxes Rented Total.

[c] Please confirm or explain that the column of numbers represents the total number of boxes installed at the listed facility, both rented and non-rented.

[d] Please advise what categories of facilities are contained in this Library Reference and what categories are not contained.

[e] How are Post Office Box numbers that are utilized for Caller Service and Firm Holdout delivery accounted for in the data shown in this Library Reference?